

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

USA FOOTBALL, INC.,	§	
	§	
Plaintiff,	§	Civil Action No. 4:23-cv-00516-ALM
	§	
v.	§	
	§	
FFWCT, LLC; USE FLAG, LLC; AND	§	
TRAVIS BURNETT,	§	
	§	
Defendants.	§	

**USA FOOTBALL INC.'S MOTION TO SEAL DOCUMENTS DESIGNATED BY
DEFENDANTS AS CONFIDENTIAL OR ATTORNEY'S EYES ONLY**

Pursuant to Local Rule CV-5(a)(7), USA Football moves for leave to file under seal seven exhibits to its Opposition to the Defendant's Motion for Partial Summary Judgment filed by Defendants, FFWCT, LLC, USA Flag, LLC, and Travis Burnett, in Civil Action No. 4:23-cv-00516. Each of these documents has been designated as Attorneys Eyes Only by Defendants in this matter, pursuant to the Protective Order (Dkt. 21).

1. Exhibit 1-B, Flag Football World Championship Tour Profit and Loss Since September 18, 2017.¹
2. Exhibit 1-C, Flag Football World Championship Tour Profit & Loss Statement January 2020 – December 2022 [FFWCT0007945-46].
3. Exhibit 1-D, Flag Football World Championship Tour Statement of Cash Flows January 2020-December 2022 [FFWCT0007947].
4. Exhibit 1-E, Flag Football World Championship Tour Balance Sheet As of December 31, 2022 [FFWCT0007948-49].

¹ This document was produced without a Bates number or confidential legend but was produced as an attachment to an email marked "Highly Confidential Attorney's Eyes Only."

5. Exhibit 1-F, Flag Football World Championship Tour Profit and Loss January 1, 2016 – December 15, 2023 [FFWCT0007950].
6. Exhibit 1-G, Flag Football World Championship Tour Balance Sheet December 15, 2023; [FFWCT0007951].
7. Exhibit 1-H, Flag Football World Championship Tour Profit and Loss January 16- December 2023 [FFWCT0008110].
8. Exhibit 1-I, Flag Football World Championship Tour Balance Sheet December 31, 2023 [FFWCT0008109].

Accordingly, in compliance with Local Rule CV-5(a)(7)(E) requiring sealing of “information that has been designated as confidential or proprietary under a protective order,” USA Football requests that these documents be sealed and admitted into evidence with its Opposition to Partial Motion for Summary Judgment.

Dated June 21, 2024

Respectfully submitted,

/s/ Kelly S. Thompson

Amie N. Peele (*pro hac*)
Indiana Bar No. 19523-29
Anne Ricchiuto (*pro hac*)
Indiana Bar No. 25760-49
Kelly S. Thompson (*pro hac*)
Indiana Bar No. 21846-49
Ashley Hodges (*pro hac*)
Oklahoma Bar No. 31082
apeele@peeelawgroup.com
aricchiuto@peeelawgroup.com
kthompson@peeelawgroup.com
ahodges@peeelawgroup.com
PEELE LAW GROUP, PC
49 Boone Village, Box 299
Zionsville, IN 46077
(202) 964-4500 (Ph)
(202) 964-4502 (Fax)

Louis T. Perry (*pro hac*)

Indiana Bar No. 25736-49
Louis.perry@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH
300 N. Meridian St., Ste. 2500
Indianapolis, IN 46204
(317) 237-0300 (Ph)
(317) 237-1000 (Fax)

David Gomez (*pro hac*)
Minnesota Bar No. 0401234
David.Gomez@faegredrinker.com
FAEGRE DRINKER BIDDLE & REATH
2200 Wells Fargo Center
90 S. Seventh Street
Minneapolis, MN 55402
(612) 766-7000 (Ph)
(612) 766-1600 (Fax)

Justin Opitz
State Bar No. 24051140
jopitz@mcguirewoods.com
MCGUIREWOODS LLP
2000 McKinney Avenue, Ste. 1400
Dallas, Texas 75201
(214) 932-6400 (Ph)
(214) 932-6499 (Fax)

Attorneys for USA Football, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 21, 2024, a true and accurate copy of the foregoing was served upon counsel of record for FFWCT, USA Flag, and Travis Burnett via ECF.

Mark D. Nielsen
Bryan Haynes
Taylor Harris
Scheef & Stone
2600 Network Blvd., Suite 400
Frisco, Texas 75034
(214) 472-2100 Telephone
(214) 472-2150 Fax

/s/ Kelly S. Thompson